

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

DEMOCRATIC NATIONAL COMMITTEE, *et al.*

Plaintiffs,

v.

REPUBLICAN NATIONAL COMMITTEE, *et al.*

Defendants.

Civil Action No.: 81-3876 (JMV) (JBC)

~~PROPOSED~~ ORDER

Upon consideration of the unopposed motion of Defendant Republican National Committee for the entry of an Order to seal, pursuant to Local Civil Rule 5.3(c), an exhibit to Plaintiff Democratic National Committee's letter motion exhibit (Dkt. No. 176, Ex. 5); the Court hereby finds:

1. The DNC has filed confidential information, the public disclosure of which could affect legitimate strategic interests of the RNC in upcoming election cycles.
2. In the Protective Order entered in this action on October 29, 2004 (Dkt. No. 16) and in the Court's Order date July 7, 2017 (Dkt. No. 167), the parties could protect confidential and competitively sensitive information disclosed to an opposing party in this litigation by designating it as "Confidential."
3. On September 13, 2017, the DNC filed under seal a letter motion containing a copy of a strategic memorandum concerning certain election related activities. The RNC designated the document as "Confidential-Subject to Protective Order [and] Attorney's Eyes Only."

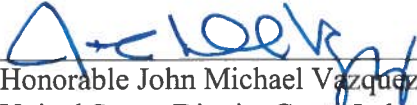
4. The information in the document designated "Confidential" satisfies the standards set forth in Local Civil Rule 5.3. The public release of this material, which includes confidential, sensitive, and strategic information would harm the RNC's competitive interests.

5. There is no less restrictive alternative to sealing the strategic memorandum.

THEREFORE, it is this 18th day of October, 2018

IT IS ORDERED that the RNC's motion to seal pursuant to Local Rule 5.3 is hereby granted; and

IT IS FURTHER ORDERED that the Clerk is hereby directed to seal the strategic memorandum.



Honorable John Michael Vazquez
United States District Court Judge